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FILE NO. 59697/00006

December 17, 2018

Via Electronic Filing

Magistrate Judge Joel Schneider
United States District Court – Camden Vicinage
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza
Camden, NJ 08101

Re: Board of Trustees of International Academy of Atlantic City Charter School vs. SABIS
Educational Systems, Inc./Springfield Education Management, LLC, et al
Civil Action No. 1:18-cv-11474-RMB/JS

Dear Judge Schneider:

I am in receipt of the letter of December 17, 2018 sent by attorney Sanu Dev complaining about our conduct in responding to Your Honor's previous Order compelling the production of documents on behalf of my client, The International Academy of Atlantic City Charter School.

My client has exhaustively searched every paper and electronic resource for these documents.

We have delivered to Ms. Dev 1,556 Bates-Stamped pages of responsive material. We have also enclosed Privilege Logs for those documents that we deem privileged. Today, we are resending a disc with all of the 1,556 pages plus an updated Privilege Log.

We cannot produce what we do not have or cannot locate.

Accordingly, our production has complied with Your Honor's Court Order.

Thank you.

COOPER LEVISON, P.A.

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Respectfully yours,

Louis Niedelman

LN/gc

cc: Sanmathi Dev, Esquire - *via E-filing*
Your File #04910-31842

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